



MEMORANDUM

TO: Laura Casey

cc: James Buchert
1126.1000.001.01 file

FROM: Diane Sinkowski

DATE: October 25, 2004

SUBJECT: Review of *Conceptual Exposure Model and preliminary Assessment for End Users of Pigment Red 144 and 214* (August 31, 2004)

I have reviewed the submitted assessment approach and exposure route and pathway dendograms. The diagrams provide a thorough preliminary estimate of the potential pathways associated with exposure to PCBs in industrial and consumer end-use products.

I just have the following brief comments:

- The dendrograms show that for consumers, exposure to PCBs could potentially occur from skin contact with and ingestion of PCBs found in surface dust. I want to make certain that, the exposure assessment considers the transfer of PCBs embedded in the material that are available at the surface of a manufactured item to skin contacting that surface. (A material does not necessarily have to produce particulates (i.e., dust) to have PCBs become available.) Similar to surface dust, some of the available PCBs in the material that adhere to the skin are inadvertently ingested from hand-to-mouth activity.
- Also, if releases from production activities are found to affect soil, then inhalation of fugitive dust should be considered as an exposure pathway.

Please call if you have any questions or need additional information.